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*Liaison Counsel for [Proposed]
Lead Plaintiff Carlos Marina*

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Lead Plaintiff Carlos Marina*

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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

TAD SCHLATRE, Individually and On
Behalf Of All Others Similarly Situated,

Plaintiff,

v.

MARATHON DIGITAL HOLDINGS, INC.,
f/k/a MARATHON PATENT GROUP, INC.,
MERRICK D. OKAMOTO, FREDERICK G.
THIEL, and SIMEON SALZMAN,

Defendants.

Case No.: 2:21-cv-02209-RFB-NJK

CLASS ACTION

**DECLARATION OF JOHN P.
ALDRICH IN SUPPORT OF
MOTION TO APPOINT CARLOS
MARINA AS LEAD PLAINTIFF,
AND APPROVE HIS SELECTION
OF LEAD COUNSEL**

1 I, John P. Aldrich, declare as follows:

2 1. I am a partner at the law firm Aldrich Law Firm, Ltd., Liaison Counsel for
3 class member Carlos Marina (“Movant”). I am an attorney licensed to practice law in the
4 State of Nevada. I make this declaration in support of Movant’s Motion to Appoint Movant
5 as Lead Plaintiff and Approve Movant’s Selection of Lead Counsel. I have personal
6 knowledge of the matters stated herein and, if called upon, I could and would competently
7 testify thereto.

8 2. Attached are true and correct copies of the following exhibits:

9 Exhibit A: Notice of pendency of class action published in *GlobeNewswire*, a
10 national business-oriented wire service, on December 17, 2021;

11 Exhibit B: Hagens Berman’s firm résumé;

12 Exhibit C: Aldrich Law Firm’s résumé;

13 Exhibit D: Chart of Movant’s estimated losses;

14 Exhibit E: Movant’s Declaration; and

15 Exhibit F: Movant’s sworn Certification.

16 I declare under penalty of perjury under the laws of the United States of America
17 that the foregoing is true and correct. Executed this 15th day of February 2022, at Las
18 Vegas, Nevada.

19
20 /s/ John P. Aldrich
21 JOHN P. ALDRICH
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CERTIFICATE OF SERVICE

I hereby certify that on February 15, 2022, I electronically filed the foregoing document using the CM/ECF system which will send notification of such filing to the e-mail addresses registered in the CM/ECF system, as denoted on the Electronic Mail Notice List.

ALDRICH LAW FIRM, LTD.

/s/John P. Aldrich
John P. Aldrich, Esq.